

EXHIBIT “C”
(House Defendants’ April 1st Production Letter)

NEXSEN PRUET

Jennifer J. Hollingsworth
Member
Admitted in SC

April 1, 2022

DELIVERED VIA EMAIL

Chris Bryant
Boroughs Bryant, LLC
1122 Lady Street, Suite 208
Columbia, SC 29201
chris@boroughsbryant.com

Re: House Defendants' Eleventh Production

Dear Chris:

On behalf of Defendants James H. Lucas (in his official capacity as Speaker of the South Carolina House of Representatives), Chris Murphy (in his official capacity as Chairman of the South Carolina House of Representatives Judiciary Committee), and Wallace H. Jordan (in his official as Chairman of the South Carolina House of Representatives Redistricting Ad Hoc Committee) (collectively, the "House Defendants"), we are producing an eleventh set of documents to Plaintiffs. This production includes documents and information from the e-mail accounts of the six remaining members of the House Redistricting Ad Hoc Committee (Rep. Bamberg, Rep. Bernstein, Rep. Collins, Rep. Elliot, Rep. Henegan, and Rep. Newton), as well as documents and information from the earlier e-mail custodians including as a result of the additional search terms (*see* ECF 202 at 8 n.7), and items that have been downgraded from House Defendants' prior privilege log circulated March 13, 2022. The production of legislatively privileged materials is made pursuant to the Court's Order of February 10, 2022, and pursuant to the terms noted in my February 15 letter with regard to protest, reservation of rights, and non-waiver.

As requested, this eleventh production is being sent via FTP to all counsel of record for Plaintiffs and the previously enumerated counsel for defendants. If counsel for the other defendants request that we provide copies of the productions to additional counsel, please let us know. The production includes 893 documents totaling 4,599 pages Bates labelled **SC_HOUSE_0102026 - SC_HOUSE_0106624**.

Please let us know if you have any questions or concerns.

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Chris Bryant
April 1, 2022
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Very truly yours,



Jennifer J. Hollingsworth

cc: Allen Chaney
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Somil Trivedi
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